

1
2
3
4
5
6 **BEFORE THE**
7 **BOARD OF REGISTERED NURSING**
8 **DEPARTMENT OF CONSUMER AFFAIRS**
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2011-501

11 **CRISTINA JEAN WILLIAMS, AKA**
12 **CRISTINA JEAN COURTER, AKA**
13 **CRISTINA COURTER WILLIAMS**
14 **112 Stonebriar Way**
15 **Terrell, TX 75160**
16 **Registered Nurse License No. 748328**

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

Respondent.

17 **FINDINGS OF FACT**

18 1. On or about December 2, 2010, Complainant Louise R. Bailey, M.Ed., RN, in her
19 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
20 Consumer Affairs, filed Accusation No. 2011-501 against Cristina Jean Williams, aka Cristina
21 Jean Courter, aka Cristina Courter Williams ("Respondent") before the Board of Registered
22 Nursing.

23 2. On or about March 30, 2009, the Board of Registered Nursing ("Board") issued
24 Registered Nurse License No. 748328 to Respondent. The Registered Nurse License expired on
25 August 31, 2010, and has not been renewed. Pursuant to Business and Professions Code section
26 118, this lapse in licensure however, does not deprive the Board of jurisdiction to take
27 disciplinary action against the license.
28

3. On or about December 2, 2010, Respondent was served by Certified and First Class Mail copies of the Accusation No. 2011-501, Statement to Respondent, Notice of Defense, Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at Respondent's address of record which, pursuant to Business and Professions Code section 136 is required to be reported and maintained with the Board. Respondent's address on record with the Board was and is:

112 Stonebriar Way
Terrell, TX 75160.

4. Service of the Accusation was effective as a matter of law under the provisions of Government Code section 11505, subdivision (c) and Business & Professions Code section 124.

5. The aforementioned documents were not returned by the U.S. Postal Service.

6. Government Code section 11506 states, in pertinent part:

(c) The respondent shall be entitled to a hearing on the merits if the respondent files a notice of defense, and the notice shall be deemed a specific denial of all parts of the accusation not expressly admitted. Failure to file a notice of defense shall constitute a waiver of respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing.

7. Respondent failed to file a Notice of Defense within 15 days after service upon her of the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 2011-501.

8. California Government Code section 11520 states, in pertinent part:

(a) If the respondent either fails to file a notice of defense or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent.

9. Pursuant to its authority under Government Code section 11520, the Board finds Respondent is in default. The Board will take action without further hearing and, based on the relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter, as well as taking official notice of all the investigatory reports, exhibits and statements contained therein on file at the Board's offices regarding the allegations contained in Accusation No. 2011-

501, finds that the charges and allegations in Accusation No. 2011-501, are separately and severally true and correct by clear and convincing evidence.

10. Taking official notice of its own internal records, pursuant to Business and Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation and Enforcement is \$630.00 as of January 4, 2011.

DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Cristina Jean Williams, aka Cristina Jean Courter, aka Cristina Courter Williams has subjected her Registered Nurse License No. 748328 to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Board of Registered Nursing is authorized to revoke Respondent's Registered Nurse License based upon the following violations alleged in the Accusation which are supported by the evidence contained in the Default Decision Investigatory Evidence Packet in this case:

a. **Disciplinary Action by the Texas Board of Nursing.** Respondent is subject to disciplinary action under Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct in that Respondent was disciplined by the Texas Board of Nursing ("Texas Board"). The circumstances surrounding the disciplinary action are as follows:

i. On or about June 3, 2009, pursuant to the Agreed Order issued by the Texas Board, in the disciplinary action entitled *In the Matter of Registered Nurse License Number 677501 issued to Cristina Williams*, the Texas Board disciplined Respondent's Registered Nurse License by ordering Respondent to successfully complete the Texas Peer Assistance Program for Nurses. The basis for the order is as follows:

ii. On or about November 2006, while employed as a Registered Nurse with Baylor University Medical Center, Dallas, Texas, Respondent wrote a prescription for Norco for a patient, even though the patient's physician did not order Norco for the patient.

iii. On or about November 2006, while employed as a Registered Nurse with Baylor University Medical Center, Dallas, Texas, Respondent was falling asleep while on duty and her handwriting was illegible.

1 iv. On or about November 2006, while employed as a Registered Nurse with
2 Baylor University Medical Center, Dallas, Texas, Respondent admitted that
3 misappropriated Norco from the facility and patients was for her own personal use.

4 v. On or about November 2006, while employed as a Registered Nurse with
5 Baylor University Medical Center, Dallas, Texas, Respondent produced a specimen for a
6 drug screen which tested positive for Hydrocodone and Acetaminophen.

7 vi. On or about May 15, 2008, while employed as a Registered Nurse with
8 Medical City Hospital-Dallas, Dallas, Texas, Respondent withdrew Hydrocodone from the
9 Medication Dispensing System for a patient on three separate occasions, and falsely
10 documented that the medication had been administered to the patient. Respondent admitted
11 to taking the patient's medication for her own personal use.

12 vii. On or about May 15, 2008, while employed as a Registered Nurse with
13 Medical City Hospital-Dallas, Dallas, Texas, Respondent produced a specimen for a drug
14 screen which tested positive for Hydrocodone.

15 b. **Disciplinary Action by the Louisiana State Board of Nursing.** Respondent is
16 subject to disciplinary action under Code section 2761, subdivision (a)(4), on the grounds of
17 unprofessional conduct in that Respondent was disciplined by the Louisiana State Board of
18 Nursing ("Louisiana Board"). The circumstances surrounding the disciplinary action are as
19 follows:

20 i. On or about September 16, 2009, pursuant to the Order issued by the
21 Louisiana Board, in the disciplinary action against Respondent's Registered Nurse
22 License, the Louisiana Board suspended Respondent's Registered Nurse License until
23 such time as the matter with the Texas Board of Nursing becomes resolved.

24 c. **Unprofessional Conduct.** Respondent is subject to disciplinary action under Code
25 section 2761, subdivision (a), in that Respondent committed acts of unprofessional conduct. The
26 conduct is more particularly described in paragraph 3, subparagraphs (a)(i) through (vii) and
27 (b)(i), inclusive, above, and herein incorporated by reference.
28

ORDER

IT IS SO ORDERED that Registered Nurse License No. 748328, heretofore issued to Respondent Cristina Jean Williams, aka Cristina Jean Courter, aka Cristina Courter Williams, is revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on April 27, 2011.

It is so ORDERED March 28, 2011



FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

DOJ Matter ID:LA2010601189
60596754.DOC

1 EDMUND G. BROWN JR.
Attorney General of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 RANDY M. MAILMAN
Deputy Attorney General
4 State Bar No. 246134
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2442
6 Facsimile: (213) 897-2804
Attorneys for Complainant

7
8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2011-501*

13 **CRISTINA JEAN WILLIAMS, AKA**
14 **CRISTINA JEAN COURTER, AKA**
15 **CRISTINA COURTER WILLIAMS**
16 **112 Stonebriar Way**
17 **Terrell, TX 75160**
18 **Registered Nurse License No. 748328**

A C C U S A T I O N

Respondent.

19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
23 Consumer Affairs.

24 2. On or about March 30, 2009, the Board of Registered Nursing issued Registered
25 Nurse License Number 748328 to Cristina Jean Williams, aka Cristina Jean Courter, aka Cristina
26 Courter Williams ("Respondent"). The Registered Nurse License expired on August 31, 2010,
27 and has not been renewed.

28 ///

///

///

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code ("Code") unless otherwise indicated.

4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

STATUTORY PROVISIONS

5. Section 118, subdivision (b) of the Code provides, in pertinent part:

"(b) The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground."

6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license.

7. Section 2761 of the Code provides, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

...

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action..."

COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Disciplinary Action by the Texas Board of Nursing)**

5 9. Respondent is subject to disciplinary action under Code section 2761, subdivision
6 (a)(4), on the grounds of unprofessional conduct in that Respondent was disciplined by the Texas
7 Board of Nursing ("Texas Board"). The circumstances surrounding the disciplinary action are as
8 follows:

9 10. On or about June 3, 2009, pursuant to the Agreed Order issued by the Texas
10 Board, in the disciplinary action entitled *In the Matter of Registered Nurse License Number*
11 *677501 issued to Cristina Williams*, the Texas Board disciplined Respondent's Registered Nurse
12 License by ordering Respondent to successfully complete the Texas Peer Assistance Program for
13 Nurses. The basis for the order is as follows:

14 a. On or about November 2006, while employed as a Registered Nurse with Baylor
15 University Medical Center, Dallas, Texas, Respondent wrote a prescription for Norco for a
16 patient, even though the patient's physician did not order Norco for the patient.

17 b. On or about November 2006, while employed as a Registered Nurse with Baylor
18 University Medical Center, Dallas, Texas, Respondent was falling asleep while on duty and her
19 handwriting was illegible.

20 c. On or about November 2006, while employed as a Registered Nurse with Baylor
21 University Medical Center, Dallas, Texas, Respondent admitted that misappropriated Norco from
22 the facility and patients was for her own personal use.

23 d. On or about November 2006, while employed as a Registered Nurse with Baylor
24 University Medical Center, Dallas, Texas, Respondent produced a specimen for a drug screen
25 which tested positive for Hydrocodone and Acetaminophen.

26 e. On or about May 15, 2008, while employed as a Registered Nurse with Medical City
27 Hospital-Dallas, Dallas, Texas, Respondent withdrew Hydrocodone from the Medication
28 Dispensing System for a patient on three separate occasions, and falsely documented that the

1 medication had been administered to the patient. Respondent admitted to taking the patient's
2 medication for her own personal use.

3 f. On or about May 15, 2008, while employed as a Registered Nurse with Medical City
4 Hospital-Dallas, Dallas, Texas, Respondent produced a specimen for a drug screen which tested
5 positive for Hydrocodone.

6 **SECOND CAUSE FOR DISCIPLINE**

7 **(Disciplinary Action by the Louisiana State Board of Nursing)**

8 11. Respondent is subject to disciplinary action under Code section 2761, subdivision
9 (a)(4), on the grounds of unprofessional conduct in that Respondent was disciplined by the
10 Louisiana State Board of Nursing ("Louisiana Board"). The circumstances surrounding the
11 disciplinary action are as follows:

12 12. On or about September 16, 2009, pursuant to the Order issued by the Louisiana
13 Board, in the disciplinary action against Respondent's Registered Nurse License, the Louisiana
14 Board suspended Respondent's Registered Nurse License until such time as the matter with the
15 Texas Board of Nursing becomes resolved.

16 **THIRD CAUSE FOR DISCIPLINE**

17 **(Unprofessional Conduct)**

18 13. Respondent is subject to disciplinary action under Code section 2761, subdivision
19 (a), in that Respondent committed acts of unprofessional conduct. The conduct is more
20 particularly described in paragraph 10, subparagraphs (a) through (f) and paragraph 12, inclusive,
21 above, and herein incorporated by reference.

22 **PRAYER**

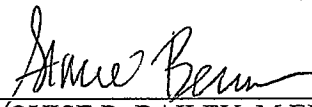
23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Board of Registered Nursing issue a decision:

25 1. Revoking or suspending Registered Nurse License Number 748328, issued to Cristina
26 Jean Williams, aka Cristina Jean Courter, aka Cristina Courter Williams;
27
28

1 2. Ordering Cristina Jean Williams, aka Cristina Jean Courter, aka Cristina Courter
2 Williams to pay the Board of Registered Nursing the reasonable costs of the investigation and
3 enforcement of this case, pursuant to Business and Professions Code section 125.3;

4 3. Taking such other and further action as deemed necessary and proper.
5
6

7
8 DATED: December 2, 2010

for 
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

11
12 LA2010601189
13 60577921.doc
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28